



The NH of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



January 10, 2020

Jay Bizarro
President
Nylon Corporation of America
333 Sundial Avenue
Manchester, NH 03103

Subject: National Pollutant Discharge Elimination System (NPDES)
Compliance Evaluation Inspection (CEI)
Nylon Corporation of America (NYCOA), Manchester, NH
NPDES Permit # NH0000116

Dear Mr. Bizarro:

On December 11, 2019, as a representative of the New Hampshire Department of Environmental Services (DES), Water Division, Wastewater Engineering Bureau, I conducted a NPDES CEI at the NYCOA facility in Manchester, NH. Objectives of the CEI included determining compliance with NPDES permit conditions, and verifying the accuracy of permit-required information and the adequacy of permittee sampling and monitoring.

The following people were present during this CEI:

Jeffrey Slark, EHS & Security Coordinator, NYCOA
Stephanie Larson, Environmental Inspector, DES

Enclosed is a copy of EPA's Water Compliance Inspection Report Form 3560-3.

DEFICIENCIES: (Response required for # 3 & 5 only).

During the inspection the following deficiencies were noted:

1. Discharge Monitoring Reports (DMRs) from the period of October 2017 through October 2019 were reviewed during the inspection. The November 2017 and April 2018 monthly DMRs and the 3rd quarter 2019 Whole Effluent Toxicity test DMR were filled out incorrectly. The DMRs were corrected and resubmitted into NetDMR.
2. Personnel did not meet the NPDES permit reporting requirements of Part II, Section D.1.e. specifically for the pH violations of May 6, 13 and 30 and October 24 & 31, 2019. The permittee is also reminded each violation of the minimum or maximum is to be counted in the final exceedance count on the monthly DMR.
3. The pH electrode storage solution had expired. Personnel must replace the solution.
4. The analytical methods on the pH and temperature benchsheets were incorrect. Benchsheets must reflect approved, in use methods with copies of relevant methods on file.
5. Personnel could not locate paperwork listing the conductivity and total residual chlorine results for the in use lab water. Personnel should either get this information from the supplier or analyze the water by the in-house lab.

COMMENTS: (No response required).

1. Please note that Part II of your recently reissued NPDES permit has been updated. Personnel should familiarize themselves with any new information.
2. NYCOA must update their current QA/QC plan to reflect the information in their new permit.

CORRECTIVE ACTIONS REQUIRED:

Describe all steps taken to correct deficiency number 3 and 5 identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. If the submitted response is acceptable to DES and has not resulted in environmental harm, DES will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

DES requests that NYCOA submit its response to this inspection by **February 14, 2020**. If DES does not receive a signed, complete response within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Stephanie Larson
NHDES/WD-WWEB
P.O. Box 95
Concord, NH 03302-0095

or

stephanie.larson@des.nh.gov

If you have any questions, please call me at (603) 271-1493.

Sincerely,



Stephanie Larson
Environmental Inspector
Compliance Section
Wastewater Engineering Bureau

cc: DES, WD, WWEB/File

ec: Teresa Ptak, NPDES Compliance, NHDES
Solanch S. Pastrana-Del Valle, Water Compliance Section, USEPA

Attachment: EPA Form 3560-3 – Water Compliance Inspection Report

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type								
1	N	2	5	3	N	H	0	0	0	0	1	1	6	11	12	1	9	1	2	1	1	17	18	C	19	S	20	2	
Remarks																													
21																													66
Inspection Work Days				Facility Self-Monitoring Evaluation Rating										B1		QA		-----Reserved-----											
67		2	5	69	70	4	71	N	72	N	73		74		75			80											

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) NYCOA 333 Sundial Ave. Manchester, NH 03103	Entry Time/Date 10:00 AM 12/11/2019	Permit Effective Date 8/1/2019
	Exit Time/Date 1:00 PM 12/11/2019	Permit Expiration Date 7/31/2024
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeffrey Slark EHS & Security Coordinator Phone: (603)627-5150 Fax:	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Jay Bizarro, President NYCOA 333 Sundial Ave. Manchester, NH 03103 Phone: (603)627-5150 Fax:		
Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations/Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
E0011	Late Submittal of DMRs
E0013	Improper/Incorrect Reporting (DMR)
E0017	Failure to Notify

Signature of Inspector <i>Stephane Larson</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	1/10/20
Signature of Management QA Reviewer Teresa Ptak <i>Teresa Ptak</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	1/10/20

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection.

A Performance Audit	M Multimedia	2 IU Sampling Inspection
B Compliance Biomonitoring	O Compliance Evaluation (oversight)	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	
L Enforcement Case Support		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C — Contractor or Other Inspectors (Specify in Remarks columns)	N — NEIC Inspectors
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
	T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.